



## LAW OFFICES OF JIMMY M. SANTOS, PLLC

Civil Rights, Labor &amp; Employment, &amp; Civil Litigation

Application granted in part.

The deadline for Plaintiff to serve and file his response to Defendant's 56.1 Statement and pre-motion conference letter is extended to and including **July 5, 2022**.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 170.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
July 1, 2022

28 Wilson Place  
Cornwall, New York 12518  
Fax: (845) 595-2266

June 30, 2022

: Dante Daly v. Westchester Board of Legislators  
Civil Action No. 19-cv-04642 (PMH)

As you are aware, I represent plaintiff Mr. Dante Daly in this disability discrimination case. With no objection from defense counsel, and on behalf of the plaintiff, the undersigned requests that Your Honor extend the deadline to file plaintiff's (and/or his portion of) of Rule 56.1 Statement and pre-motion letter a 2<sup>nd</sup> time for an additional one (1) day until on or by tomorrow, July 1, 2022 at 5:00 PM.

As was indicated previously to Your Honor in his 1<sup>st</sup> request, the main reasons for Plaintiff's request for this extension are that: (1) the final deposition (of four [4] taken on Monday and Tuesday) was completed at approximately 4:00 PM Tuesday of which there were scheduling conflicts; and (2) this morning I had a follow-up appointment with respect to a potential heart condition. Plaintiff needs additional time to review the evidentiary record, and incorporate it into the Joint Rule 56.1 Statement and pre-motion letter. This is the second request for an extension by the plaintiff with respect to service/ filing of these documents.

On behalf of the Plaintiff, and with no objection by defense counsel, the undersigned respectfully requests that the Court extend the deadlines for plaintiff's (and/or its portion thereof) of his Rule 56.1 Statement and pre-motion letter for an additional day until on or by July 1, 2022 at 5:00 PM.

Thank you for Your Honor's attention.

Respectfully Submitted,

/S/ Jimmy M. Santos  
Jimmy M. Santos, Esq.

cc: Irma M. Cosgriff, Esq., defendant's counsel  
(via ECF only)

